

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :  
: Plaintiff, : Criminal Action No. 23-77- MN  
DAVID MORRISON, :  
: Defendant. :  
:

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE PRE-TRIAL MOTIONS**

Defendant, David Morrison, by and through his undersigned counsel, David L. Pugh, Assistant Federal Public Defender, hereby moves this Court, pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a), for an Order extending the time to file pre-trial motions in this case.

In support of this motion the Defendant avers as follows:

1. On August 2, 2023, Mr. Morrison had his initial appearance in the United States Court in the District of Delaware in response to a complaint charging him with one count of transportation of child pornography in violation of 18 U.S.C. § 2252A(a)(1) and (a)(2), one count of receipt of child pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) and one count of possession of child pornography in violation of 18 U.S.C. § 2252A(b)(1) and (b)(2).

2. On August 31, 2023, Mr. Morrison waived his detention and preliminary hearings. He was subsequently indicted on September 5, 2023, on the identical charges contained in the complaint. Mr. Morrison entered a not guilty plea at his arraignment on September 14, 2023. At that same hearing, the Court also set the pre-trial motions deadline for October 16, 2023.

3. Defense counsel has only recently begun the process of discovery review.

4. As a result, Defense counsel requires additional time to review the discovery before meeting with Mr. Morrison to discuss it. Defendant respectfully requests an additional sixty (60) days in which to file pre-trial motions.

5. Assistant United States Attorney Briana Knox has informed Defense counsel that the government does not oppose the instant motion.

6. The defense has no objection to excluding under the Speedy Trial Act (18 U.S.C. § 3161, et seq.), the time from October 16, 2023, until the new due date for pre-trial motions. The defense submits that the time is excludable because the ends of justice served by the delay outweigh the best interest of the public and the Defendant in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended to a date on or after December 15, 2023.

Respectfully submitted,

ELENI KOUSOULIS  
Federal Public Defender

Dated: October 2, 2023

By: /s/ David L. Pugh  
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